

**Ecology's Responses to Goldendale's Comments**  
**Air Operating Permit**  
**July 22, 2004**

**Comment #1:** Table of Contents: The page listings for each category seem to be off by a page or two, A is actually page 5 instead of 4.

**Response to comment #1**

Ecology accepts this comment and has made some page number changes: #4 to #5, #97 to #96, and #99 to #98.

**Comment #2:** Page 4, First paragraph, word table should be capitalized.

**Response to Comment #2**

Ecology accepts this comment and made a change to capitalize the word "table" to "Table".

**Comment #3:** Condition C: Header section for Conditions No. And Emissions Unit, the nit for Unit has been dropped off, but is reinstalled in Condition D.

**Response to Comment #3**

Ecology accepts this comment by changing "U" to "Unit".

**Comment #4:** Condition A.4 The Statement "State only requirement" should also be included in Condition A.2 and A.3.

**Response to Comment #4**

Ecology accepts this comment by adding "State-only Requirement" in Conditions A.2 and A.3.

**Comment #5:** Condition A.6-A.9 the statement "State only requirement" is under Parameters, it should be under Basis of Authority.

**Response to Comment #5**

Ecology accepts this comment by moving the statement "State only requirement" from under Parameters to Basis of Authority.

**Comment #6:** Condition B.1 Under the Monitoring, Reporting, & Recordkeeping, there are two periods after B.24.

## **Response to Comment #6**

Ecology accepts this comment by deleting the second period.

**Comment #7:** Condition B.24 This condition, while understandable is somewhat overkill, considering all the historical data that has been presented. GAC would like to see language allowing after 1 year of this testing that a reduction 1 test/year per primary stack be allowed as it is under Primary MACT. GAC will present the data collected and show the low level of variation that occurs over a year in testing. Also the support data required by the PSD permit, i.e. specific gravity, pH, flow, fan amperage, will show that the control device is operated in a consistent manner that prevents any excess emissions. This would upon review by the agency to grant this change.

## **Response to Comment #7**

Ecology believes that monthly source testing of the primary system is necessary to demonstrate ongoing compliance with particulate and fluoride standards.

**Comment #8:** Condition B.42 should state B.40 instead of B.39.

## **Response to Comment #8**

Ecology accepts this comment and has changed B.39 by B.40.

**Comment #9:** B.45 Page 32 should be B.40-B43 instead of B.39-B.43.

## **Response to Comment #9**

Ecology accepts this comment and has replaced B.39 with B.40.

**Comment #10:** B55 Page 35 Under Monitoring, Reporting, And Recordkeeping: the first two bullets on the training plan references prebake doors on the cells. These are not applicable to a VSS1 smelter as there are no doors on our cells. They should be removed. If left in place we would always be out of compliance for something we do not have. Also does not this condition mirror Conditions B.17 and B.40?

## **Response to Comment #10**

Ecology accepts this comment and the first two bullets have been deleted.

**Comment #11:** Condition C.5 Under the Basis of Authority, a little b should be here instead of capital B, 63.843(b)(3).

## **Response to Comment #11**

Ecology accepts this comment and has replaced 63.843(B)(3) with 63.843(b)(3).

**Comment #12:** Condition C.6 this is new about hourly average on temperature with (?), should be 93 degrees.

**Response to Comment #12**

Ecology accepts this comment and has replaced ? with 93.

**Comment #13:** Condition C.8 Strike the two question marks.

**Response to Comment #13**

Ecology accepts the comment by deleting the two question marks.

**Comment #14:** Condition C.11 Please reference B.12 and B.47 where the Paste Plant is already included in the SSM Plan

**Response to Comment #14**

Ecology believes it is clearer to address them separately.

**Comment #15:** Condition D.4 GAC feels this condition should follow the Conditional Order, 'upon ecology request', thus being consistent with the Order. Otherwise we could follow the DOE rule that by definition of any unit over 100,000 acfm, this becomes an emission unit and should be tested once/year. GAC would have to attach an extension to this unit in order to test and also because of the large area this is drawing it is actually an ieu. GAC requests that this test is done once/5 years of the permit and that Condition D.5-D.7 be the surrogates that this EU is running properly.

**Response to Comment #15**

Ecology agrees that the order should be consistent with the permit. Ecology also believes that annual testing is necessary to demonstrate ongoing compliance. The order will be revised to include annual testing.

**Comment #16:** Condition E.5 Tilter Melter/Holder Furnace is a smaller unit than the Homogenizing furnaces in E.1, which only requires 1 test/5years each. This unit also should be 1 test/5yrs and use conditions E.6, 7, & 8 for showing compliance.

**Response to Comment #16**

Ecology does not accept the comment. and the requirement will remain as it is.

**Comment #17:** Condition E.19 The last bullet on Monitoring, Reporting, & Recordkeeping. September 24, 2002 is no longer correct. EPA changed this to March 24, 2003 in a follow-up ruling and is still awaiting final promulgation.

**Response to Comment #17**

Ecology accepts the comment and has changed the date from September 24, 2002 to March 24, 2003.